

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
-vs-)	No. 20-CR-240-F
)	
BOBBY CHRIS MAYES,)	
CHARLES GOOCH, and)	
COURTNEY WELLS,)	
)	
Defendants.)	

NOTICE REGARDING RESTITUTION

On November 3, 2023, the Court held a hearing regarding the sentencing of Defendant Bobby Chris Mayes. Prior to that hearing, on the issue of restitution to be awarded, the United States had reached an agreement with Mr. Mayes for the payment of restitution (the “Agreement”). The Agreement was codified as part of a written agreement filed with the Court on June 21, 2023 (Doc. 334.)

Following the sentencing, a discrepancy was noted between individual restitution amounts listed for each lender/victim and the amount listed as the total restitution. Specifically, the Agreement (Doc. 334 at ¶8) contained a table listing the amounts owed to each of 12 lenders with a total amount of restitution amount of \$1,160,825.72. However, it was learned that adding up

each individual amount for each lender yielded a total of \$1,163,883.05, \$3,057.33 higher than the “Total” listed in the table at Paragraph 8.

When notified of this discrepancy, undersigned counsel researched the source of the issue. It was discovered that in an earlier draft of the Agreement, the amount that was listed as due and owing to Americredit/GM Financial was listed as \$60,419.10. This amount was derived from an initial letter that was sent to the United States by the lender. However, in May of 2023, Americredit/GM Financial sent a revised letter updating its losses to \$63,476.43. The difference between the two numbers is \$3,057.33. When the final agreement was negotiated and signed, the updated amount of \$63,476.43 was listed for Americredit/GM Financial. However, due to an oversight and the fault solely of undersigned counsel, the amount listed as the “Total” in Paragraph 8 of the Agreement was not updated to reflect the new total. In other words, each individual total listed for each lender is correct in Document 334, but the “Total” is an error.

Having traced the source of this issue, undersigned counsel contacted counsel for Mr. Mayes by e-mail and sent the various letters received from Americredit/GM Financial pinpointing the source of the change and the error. Counsel for Mr. Mayes has confirmed that they agree with the analysis set forth above, that Mr. Mayes has agreed to pay the additional \$3,057.33 (and indeed has already attempted to tender that additional amount) and that Mr.

Mayes agrees that the total amount of restitution owed should be entered as \$1,163,883.05 in any final judgment in this case.

Respectfully submitted,

ROBERT J. TROESTER
United States Attorney

s/ THOMAS B. SNYDER
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CERTIFICATE OF SERVICE

I hereby certify that on November 9, 2023, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to all ECF registrants of record in this matter.

s/THOMAS B. SNYDER

Assistant United States Attorney